

# **EXHIBIT B**

## Ahmad & Capodice, PLLC

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Phone: 832-767-3207  
Fax: 281-864-4379

# Fax

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**To: Luke MacDowall**

**From: Nasim Ahmad**

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**Fax: 7139519212**

**Pages: 29**

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**Re: Buzl v. BCM**

**Date: June 26, 2019**

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Please see Plaintiff's Responses to Defendant's First Set of Interrogatories and First Request for Production of Documents.

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RUTH BUZI, Ph.D.  
Plaintiff

v.

BAYLOR COLLEGE OF MEDICINE  
Defendant

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 4:18-cv-3753

JURY DEMANDED

**PLAINTIFF'S ANSWERS TO DEFENDANT'S  
FIRST SET OF INTERROGATORIES TO PLAINTIFF**

To: Defendant, Baylor College of Medicine, by and through its counsel of record, Nehal S. Anand and Luke C. MacDowall, LITTLER MENDELSON, P.C., 1301 McKinney Street, Suite 1900, Houston, Texas:

Pursuant to the Federal Rules of Civil Procedure, Plaintiff serves these Answers to Defendant's First Set of Interrogatories to Plaintiff.

Respectfully submitted,

AHMAD & CAPODICE, PLLC

/s/ Nasim Ahmad

Nasim Ahmad

Texas Bar No. 24014186

Dwain Capodice

Texas Bar No. 24031915

24900 Pitkin, Suite 300

The Woodlands, Texas 77386

Telephone: (832) 767-3207

Telecopier: (281) 864-4379

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of June, 2019, a true and correct copy of the above and foregoing document has been forwarded to counsel of record, as follows:

Nehal S. Anand

Luke C. MacDowall

LITTLER MENDELSON, P.C.

1301 McKinney Street, Suite 1900

Houston, Texas

/s/ Nasim Ahmad

Nasim Ahmad

**PLAINTIFF'S ANSWERS TO  
DEFENDANT'S FIRST SET OF INTERROGATORIES**

**INTERROGATORY NO. 1:**

With respect to the claims you are making in this action, please identify all persons who have or may have knowledge, information and/or relevant or discoverable facts (including personal or hearsay knowledge) regarding such claims and with respect to each, state the following:

- a. the person's business and residential addresses and telephone numbers; and
- b. whether the person has been contacted and/or interviewed by you, your attorney, any investigator, or other person acting on your behalf concerning this case, and whether notes, memoranda, tape recordings or other written or oral statements have been taken from such person or in regards to the contact with any such person.

**RESPONSE:**

Objection. This interrogatory is overly broad and seeks attorney work product and information protected by the attorney client privilege. Subject thereto, see Plaintiff's Rule 26 disclosures containing the identity of individuals with knowledge of relevant facts. Any discoverable documents shall be produce in response to Defendant's Request for Production of Documents.

**INTERROGATORY NO. 2:**

Please state whether you, your attorney, any investigator, or any other person acting on your behalf have taken any written or oral statement from any party involved in this lawsuit, or its agents, or third parties with knowledge of relevant facts, concerning any issue involved in this case. As to each person listed, state the name, address, and business position of the person giving the statement; date the statement was given; name, address, and business position of the person to whom the statement was given; and the name, address, and business position of the person of the person maintaining custody of the statement.

**RESPONSE:**

All discoverable witness statements shall be produced in response to Defendant's Request for Production of Documents.

**INTERROGATORY NO. 3:**

Please identify all physicians, therapists, counselors, psychiatrists, psychologists or other health care providers with whom you have sought treatment or counseling in the past 10 years, and, with respect to each, identify the person named, their business address, telephone number, the date(s) of treatment(s), and reason for treatment.

**RESPONSE:**

Objection. This interrogatory is overly broad, intrusive, seeks private and sensitive information of Plaintiff that is not reasonably calculated to lead to the discovery of admissible evidence and thus exceeding the permissible scope of discovery under Rule 26. Subject thereto, please see Plaintiff's Rule 26 disclosures for the identify of individuals Plaintiff's believes has knowledge of relevant facts.

**INTERROGATORY NO. 4:**

Please state the name, address, and telephone number of any experts used for consultation, or who are not expected to be called as a witness at trial, if their opinions, impressions, or work product have been reviewed by an expert who is to testify in this lawsuit, and identify the testifying experts who have reviewed the consulting experts' work product.

**RESPONSE:**

None at this time.

**INTERROGATORY NO. 5:**

Please list and itemize in detail all damages (including your model or method for calculating damages, and all calculations relating to same) that you are claiming in this action, including, without limitation, actual damages, loss of income, back pay, front pay, compensation for benefits not received, compensatory damages, attorney's fees, exemplary damages, costs of court, and prejudgment and post-judgment interest.

**RESPONSE:**

See Plaintiff's Rule 26 disclosures for Plaintiff's damage calculation.

**INTERROGATORY NO. 6:**

Please state the following with respect to each and every employer or other entity by whom you were employed in the 10 years prior to beginning your employment with Baylor College of Medicine in May 1993:

- a. the name and address of each such employer or entity, including number, street, city or town, state, and country;
- b. your job title(s);
- c. the duties and nature of your work;
- d. the name, address, and job title of your immediate supervisor; and
- e. the beginning and ending dates of each such employment or work, including the reason for your leaving said employment or work.

**RESPONSE:**

Objection. This interrogatory is overly broad, intrusive, and is not reasonably calculated to lead to the discovery of admissible evidence and thus exceeding the permissible scope of discovery under Rule 26.

**INTERROGATORY NO. 7:**

Please list all other lawsuit, including administrative agency charges, in which you have been involved as a party or witness and with respect to each, state the following:

- a. the full style of the case, including case number and court, or agency;
- b. the current status of each matter; and
- c. the allegations generally being made in the suit or charge.

**RESPONSE:**

Objection. This interrogatory is overly broad, intrusive, and is not reasonably calculated to lead to the discovery of admissible evidence and thus exceeding the permissible scope of discovery under Rule 26.

**INTERROGATORY NO. 8:**

Please identify the date and substance of each and every posting you have made to Facebook, Myspace, Twitter, or any other internet site, blog or message board that in any way concerns or relates to the allegations in this case, including in your answer the URL of the site to which the posting was made.

**RESPONSE:**

Objection. This interrogatory is overly broad, intrusive, and is not reasonably calculated to lead to the discovery of admissible evidence and thus exceeding the permissible scope of discovery under Rule 26.

**INTERROGATORY NO. 9:**

Please identify each person who prepare, assisted, answered, or supplied information in preparation of the responses to these Interrogatories.

**RESPONSE:**

Plaintiff, with assistance of counsel.

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

RUTH BUZI, Ph.D.	§	
Plaintiff	§	
	§	
v.	§	CIVIL ACTION NO. 4:18-cv-3753
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**PLAINTIFF'S RESPONSES TO DEFENDANT'S  
REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

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**PLAINTIFF'S RESPONSES TO  
DEFENDANT'S FIRST REQUEST FOR PRODUCTION**

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**REQUEST FOR PRODUCTION NO. 103:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 104:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 105:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 106:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 107:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 108:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 109:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 110:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 111:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 112:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 113:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 114:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 115:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 116:**



Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 117:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 118:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 119:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 120:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 121:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 122:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 123:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 124:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 125:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 126:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 127:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 128:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 129:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 130:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 131:**

Objection. This request in seeking “all documents” pertaining to the allegations is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 132:**

See Plaintiff’s Initial Disclosures. Plaintiff will supplement as discovery progresses.

**REQUEST FOR PRODUCTION NO. 133:**

Objection. This request is overly broad, intrusive, and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 134:**

Objection. This request in seeking “all documents” pertaining to Plaintiff’s claims is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject thereto, see documents produced.

**REQUEST FOR PRODUCTION NO. 135:**

Responsive documents shall be produced.

**REQUEST FOR PRODUCTION NO. 136:**

Objection. This request is vague. Subject thereto, Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 137:**

See documents produced.

**REQUEST FOR PRODUCTION NO. 138:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 139:**

Objection. This request is vague, overly broad and seeks documents protected by the attorney client privilege.

**REQUEST FOR PRODUCTION NO. 140:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 141:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 142:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 143:**

Objection. This request is overly broad and not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 144:**

See documents produced.

**REQUEST FOR PRODUCTION NO. 145:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 146:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 147:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 148:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 149:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 150:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 151:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 152:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 153:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 154:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 155:**

Responsive documents shall be produced.

**REQUEST FOR PRODUCTION NO. 156:**

Responsive documents shall be produced.

**REQUEST FOR PRODUCTION NO. 157:**

Plaintiff has no responsive documents.

**REQUEST FOR PRODUCTION NO. 158:**

Objection. This request is vague as to sent to or received by "Defendant."

**REQUEST FOR PRODUCTION NO. 159:**

Objection. This request is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 160:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 161:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 162:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 163:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.

**REQUEST FOR PRODUCTION NO. 164:**

Objection. This request is overly broad, intrusive, seeks private and sensitive information and is not reasonably calculated to lead to the discovery of admissible evidence.